

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA,)	
)	
v.)	No. 1:19-cr-59
)	
DANIEL EVERETTE HALE,)	Hon. Liam O’Grady
)	
Defendant.)	

MOTION FOR *PRO HAC VICE* ADMISSION

Pursuant to Local Rule 57.4, undersigned counsel for Daniel E. Hale moves this Court to grant *pro hac vice* status to pro bono counsel Ruth Vinson, Esquire, so that she can appear on behalf of the defendant at upcoming court hearings. The undersigned states the following in support of this motion:

1. Mr. Hale is charged in a five count superseding indictment with, among other charges, theft of government property; and obtaining, retaining and disclosing classified and/or national defense information. His arraignment was held on May 17, 2019, and trial has been set for March 16, 2020.
2. Ms. Vinson is a 2014 graduate of New York University School of Law. She is admitted to the bars of California, the District of Columbia, the United States District Court for the Northern District of California, and the United States Court of Appeals for the Eighth Circuit. She is an associate at Zuckerman Spaeder LLP, which is a participating partner in the Federal Public Defender’s Pro Bono Counsel Program. Ms. Vinson has committed to assist in all aspects

of Mr. Hale's case. She will be supervised by undersigned counsel, who will be present in court with her at all of Mr. Hale's hearings.

3. Ms. Vinson's Application for *Pro Hac Vice* admission before this Court is attached hereto.
4. Given that Ms. Vinson's work on the defendant's case is pro bono and done under the auspices of the Federal Public Defender's Pro Bono Counsel Program, undersigned counsel also move for a waiver of the \$75.00 *pro hac vice* fee.

Accordingly, for the foregoing reasons, it is respectfully requested that this motion be granted and that the Court enter the proposed attached order.

Respectfully submitted,

DANIEL EVERETTE HALE

By Counsel,
Jeremy C. Kamens
Federal Public Defender

/s/ Cadence Mertz
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CERTIFICATE OF SERVICE

I hereby certify that on October 7, 2019, I filed the foregoing via the CM/ECF system, which will electronically serve a copy upon counsel of record.

/s/ Cadence Mertz
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